

REMARKS / ARGUMENTS

Claims 1-26 have been rejected under 35 USC 102(e) as being anticipated by Habegger (US Pat. No. 6,643,642 B1) ("Habegger"). Habegger teaches a system for storing and retrieving records in a database storage unit by employing a hierarchical data map. (see Abstract, first sentence) Habegger is completely silent on any teaching or suggestion of "machine vision", which is required by all of claims 1-26. In fact, each element of claim 1, for example, includes a reference to either "machine vision entities", or a "machine vision system". Claims 1-26 were previously amended in a variety of ways such that it is was made more clear that all the claims relate to a **machine vision system** having a plurality of **machine vision** entities, such as those entities shown in Fig. 3A of Applicant's specification. Thus, a **machine vision entity** can be an image data base, a Caliper tool, a PMAlign, a Fixture, or a Light Meter, for example. Such entities can include generally image sources, image transformations, image processing, image interpretation, image measurements, any general image function, and image storage facilities.

By contrast, Habegger teaches standard PC software entities, such as word processing, typing tutor, business draw, slide creator, and presentation programs, for example, as shown in Fig. 6 of Habegger. These standard PC software entities are arranged in a hierarchical fashion.

The Examiner cites Fig. 6, and col. 7, lines 1-40 as teaching machine vision entities, but clearly no machine vision entities are present therein.

Machine vision entities provide, receive, or transmit image data in accordance with data flow interrelationships between and/or among the machine vision entities. These data flow interrelationships are non-hierarchical. The claims clearly require a plurality of **non-hierarchical data flow** interrelationships. Thus, it is important to note that the non-hierarchical interrelationships are non-hierarchical **data flow** interrelationships.

By contrast, there are NO data flow relationships in Habegger, and in particular, NO non-hierarchical data flow relationships. Instead, the nodes of Habegger are merely cross-linked to facilitate searching. See col. 1, lines 57-63, col. 5, lines 22-36, and col. 7, lines 7-41.

Moreover, Applicant's invention requires DISPLAY of the enhanced tree-style representation, specifically requiring in the last element of claim 1, for example:

"displaying said enhanced tree-style graphical representation to produce said graphical user interface on said screen of said visual display unit of said machine vision system".

By contrast, Habegger does not teach a machine vision system, and does NOT teach display of an enhanced tree-style graphical representation. Instead, Habegger teaches display of search results, col. 4, lines 30-33, including the searchable term of the node returned by the search engine, a broader term

(BT), any number of narrower terms (NTs), and any number of related terms (RTs). See, for example, Fig. 4 of Habegger, col. 6, lines 16-31. Note that the tree-style graphical representation of Fig. 6 of Habegger is NOT displayed. Fig 6 is not displayed in the user interface. For example, the user interface 102 in Fig. 1 is distinct from the hierarchical data map 106 in Fig. 1 (col. 4, lines 30-35).

Thus, the preamble and the last element of claim 1 are clearly not taught by Habegger.

Moreover, the first and second elements are not taught by Habegger, in part because each requires a plurality of machine vision entities. Further, the first element is not taught by Habegger because Habegger never constructs a graphical representation of the hierarchical interrelationships among said plurality of entities, as required by claim 1. Instead, the hierarchical relationships of Fig. 6 are merely used by the search software; the only place that the tree-style structure is graphically represented is in Fig. 6 of the patent document of Habegger, for the convenience of the reader of the patent document.

Regarding the second element of claim 1, since Habegger is silent on data flow relationships, and the second element requires data flow relationships, the second element is not taught by Habegger.

Likewise, since the third element also requires data flow relationships, as well as machine vision entities, the third element is NOT taught by Habegger.

Since none of the elements of claim 1 are taught by Habegger, the rejection of claim 1 is deemed to be overcome.

Regarding claim 2, since Habegger never displays the tree-style representation, Habegger does not "obtain said first specification from an interactive graphical user interface". The Examiner cites col. 2, lines 51-61, but therein it is clear that the hierarchical structure ALREADY EXISTS, and is being used by the search engine to retrieve unique identifiers. This citation is therefore irrelevant. By contrast, Applicant teaches and claims constructing a hierarchical graphical structure. Habegger is silent thereon. Further, claim 2 depends from claim 1, herein deemed to be allowable. Accordingly, the rejection of claim 2 is deemed to be overcome.

Regarding claim 3, again the hierarchical structure ALREADY EXISTS, and so do the non-hierarchical cross-links. See col. 7, lines 24-26 within the Examiner's citation, wherein it states: "in traversing the data map, the search engine utilizes cross-links between the data nodes". By contrast, claim 3 requires "obtaining said second specification from an interactive graphical user interface". The cross-links in Habegger are not presented graphically in any user interface. Further, claim 3 depends from claim 1, herein deemed to be allowable. Accordingly, the rejection of claim 3 is deemed to be overcome.

Regarding claim 4, Habegger does not teach data flow relationships, or machine vision entities. Habegger also does not teach constructing said

enhanced tree-style graphical representation, since the tree shown in Fig. 6 never appears in a user interface in Habegger. Further, claim 4 depends from claim 1, herein deemed to be allowable. Accordingly, the rejection of claim 4 is deemed to be overcome.

Regarding claim 5, Habegger never depicts either hierarchical relationships or non-hierarchical relationships in a user interface, as required by claim 5. Further, claim 5 depends from claim 4, herein deemed to be allowable. Accordingly, the rejection of claim 5 is deemed to be overcome.

Regarding claim 6, Habegger does not teach data flow relationships, or machine vision entities. Habegger also does not teach graphically displaying said enhanced tree-style graphical representation, since the tree shown in Fig. 6 never appears in a user interface in Habegger. Further, claim 6 depends from claim 4, herein deemed to be allowable. Accordingly, the rejection of claim 6 is deemed to be overcome.

Regarding claims 7-9, 10-13, 14-17, 18-19, 20, 21, 22, 23, 24, 25, and 26, these claims are also deemed to be allowable for analogous reasons, since each requires essential the same aspects and/or elements as claims 1-6.

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Consequently, all of the claims now require elements that are not taught, suggested, or motivated by Habegger.

The prior art made of record and not relied upon does not appear to present an impediment to the allowance of the present application.

Accordingly, Applicants assert that the present application is in condition for allowance, and such action is respectfully requested. The Examiner is invited to phone the undersigned attorney to further the prosecution of the present application.

Respectfully Submitted,

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